

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

REPRESENTATIVE HUGH BLACKWELL, in
his official capacity as Chair of the House
Standing Committee on Elections, et al.,

Defendants.

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF
THE NAACP, et al.,

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as the
President Pro Tempore of the North Carolina
Senate, et al.,

Defendants.

Civil Action No. 23 CV 1104

***WILLIAMS* PLAINTIFFS' NOTICE OF FILING CORRECTED
SUPPLEMENTAL EXPERT REBUTTAL REPORT OF DR. JONATHAN
RODDEN AND ERRATA TO THE SUPPLEMENTAL REBUTTAL REPORT OF
DR. JONATHAN RODDEN**

Williams Plaintiffs hereby notify the Court and all parties of the filing of the Corrected Supplemental Expert Rebuttal Report of Dr. Jonathan Rodden, dated November 20, 2025, and an Errata to the Supplemental Expert Rebuttal Report of Dr. Jonathan Rodden, dated November 20, 2025. ECF No. 206-4:

1. On November 18, 2024, *Williams* Plaintiffs filed the Supplemental Expert Rebuttal Report of Dr. Jonathan Rodden. ECF No. 206-4.

2. On the morning of November 19, counsel for Legislative Defendants emailed counsel for *Williams* Plaintiffs indicating their expert believed there were errors in the materials underlying certain simulations discussed on pages 11–14 of Dr. Rodden’s Supplemental Expert Rebuttal Report.

3. *Williams* Plaintiffs and Dr. Rodden were not able to fully assess the purported errors ahead of the hearing on *Williams* Plaintiffs’ Motion for Preliminary Injunction scheduled for the same day, November 19, at 1 pm. However, out of an abundance of caution, in advance of the hearing, counsel for *Williams* Plaintiffs emailed counsel for Legislative Defendants and agreed “to withdraw the portion of Dr. Rodden’s report filed [on November 18] that relates to the new simulations Dr. Rodden conducted . . . (e.g., the discussion of the simulations on pp. 11–14 of the report).”

4. Later that day, at the hearing on *Williams* Plaintiffs’ Motion for Preliminary Injunction, counsel for *Williams* Plaintiffs notified the Court that it withdrew the portions of Dr. Rodden’s Supplemental Expert Rebuttal Report that discussed Dr. Rodden’s new simulations on pages 11–14 of the report. Counsel also represented that *Williams* Plaintiffs would provide the Court with additional information after investigating the alleged issues.

5. As identified in the attached Third Declaration of Lalitha D. Madduri in Support of *Williams* Plaintiffs’ Motion for Preliminary Injunction, *Williams* Plaintiffs submit: (i) the Corrected Supplemental Expert Rebuttal Report of Dr. Jonathan Rodden dated November 20, 2025; (ii) a redline identifying the changes made in the corrected

report; and (iii) an Errata to the Supplemental Expert Rebuttal Report of Dr. Jonathan Rodden, November 20, 2025.

6. The corrections to Dr. Rodden's Supplemental Expert Rebuttal Report appear on pages 12–14 of document (i) described above and on pages 12–14 of document (ii) described above.

Dated: November 20, 2025

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** Special Appearance pursuant to
Local Rule 83.1(d)*

CERTIFICATE OF SERVICE

On this 20th day of November, 2025, I electronically filed the foregoing using the Court's CM/ECF system. Counsel for all parties to the case are registered CM/ECF users and will be served by that system.

/s/ Lalitha D. Madduri
Lalitha D. Madduri